

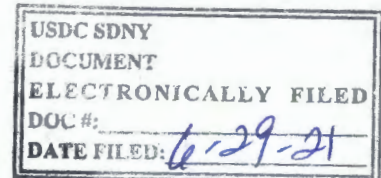
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June 25, 2021



The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Rickey Johnson
21 CR 194 (LAK)**

Dear Judge Kaplan:

With the consent of the Government, I write to request an extension of the deadline for pretrial motions in the above-referenced matter. The Government has disclosed to the defense hundreds of videos and photos in reference to this case, and anticipates an additional discovery production by the end of next week. The exact size of this production is unknown at the filing of this letter but is expected to include additional video and electronic data. As the Court is aware, Mr. Johnson is currently incarcerated at the MDC Brooklyn and has limited access to a computer to review his digital discovery. I need additional time to review the voluminous discovery and the anticipated discovery with Mr. Johnson before filing pretrial motions. Therefore, with the Government's consent, I respectfully request that the Court endorse the following schedule:

- Mr. Johnson's pretrial motions due by August 13, 2021.
- Government response by August 27, 2021.
- Mr. Johnson's reply by September 3, 2021.

Respectfully submitted,

/s/
Zawadi Baharanyi
Assistant Federal Defender
917-612-2753

cc: Patrick Moroney
Assistant United States Attorney

Granted
SO ORDERED

LEWIS A. KAPLAN, USDJ
6/29/21